



STATE OF NEW MEXICO  
Department of Military Affairs

10 Bataan Boulevard  
Santa Fe, New Mexico 87508-4695

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SUPERFUND DIV.  
DIRECTOR'S OFFICE

**Susana Martinez**

*Governor*

June 20, 2012

**John D. Bledsoe Jr.**

*Brigadier General*

*Acting Adjutant General*

Ms. Cynthia Brown

US Environmental Protection Agency

Region 6

1445 Ross Avenue

Dallas, TX 75202-2733

[Brown.Cynthia@epa.gov](mailto:Brown.Cynthia@epa.gov)

Dear Ms. Brown:

We enclose the New Mexico National Guard and New Mexico State Armory Board's response to the CERCLA Section 104(e) request received by our office on May 16, 2012. This request pertains to the Griggs and Walnut Ground Water Plume Site (the "Site") that is located in the City of Las Cruces, New Mexico.

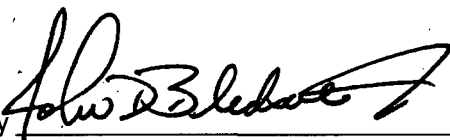


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If you have questions, please contact Sara Martinez at (505) 474-1704. Legal questions concerning this response should be directed to the law firm of Sutin, Thayer & Browne, through Frank Salazar at 505-883-3304 or Sarita Nair at 505-883-3417.

Sincerely,

The New Mexico National Guard and the New  
Mexico State Armory Board

By  \_\_\_\_\_

Brigadier General John D. Bledsoe Jr.

Acting Adjutant General

cc with enclosure via email:

Mr. James E. Costello, Attorney (6RC-S) ([costello.james@epa.gov](mailto:costello.james@epa.gov))

Mr. Frank Salazar ([FCS@sutinfirm.com](mailto:FCS@sutinfirm.com))

Ms. Sarita Nair ([SXN@sutinfirm.com](mailto: SXN@sutinfirm.com))

**INFORMATION REQUESTED**

**1. "Identify (see Definitions) the person(s) responding to this information request on behalf of the Board."**

Brigadier General John Bledsoe

10 Bataan Boulevard, Santa Fe, NM 87508

505-474-1704

Sara Martinez

Environmental Specialist, NMARNG-CFMO-Environmental Section, NMARNG

10 Bataan Boulevard, Santa Fe, NM 87508

505-474-1704

**2. "For your response to any information requested, identify (see Definitions) all persons (see Definitions) consulted in the preparation of your response."**

Brigadier General Paul Pena, Deputy Adjutant General, NMARNG

10 Bataan Boulevard, Santa Fe, NM 87508

505-474-1941

SFC Doug Mallary, Historian

Bataan Memorial Military Museum & Library

1050 Old Pecos Trail, Santa Fe, NM 87501

505-474-1670

Frank Salazar and Sarita Nair

Sutin Thayer & Browne, a Professional Corporation

Outside counsel for the New Mexico State Armory Board

Two Park Square, Suite 1000

6565 Americas Parkway, N.E., Albuquerque, NM 87110

505-883-2500

**3. "At any time during this period from January 1, 1960, to December 31, 1979, did the bore cleaner known as "CR" that was used at the Armory (see Definitions) contain PCE (see Definitions)?"**

Materials Safety Data Sheets are not available for the Armory during the time the National Guard federal technicians operated it. We have no independent documentation or knowledge of PCE content in CR that may have been used at the Armory during the time the National Guard federal technicians operated it. We, the NMARNG, feel that we met all requirements that were in place at the time of operation at the Solano property. The NMARNG was only required to keep environmental documents for three years and were destroyed after that.

We note that the Marten Group, on behalf of the City of Las Cruces and the County of Dona Ana, has provided information regarding this issue to the EPA, and that we have received copies of that information. We have not verified those materials and make no statement as to the applicability or accuracy of the materials that the Marten Group has provided.

**4. "At any time during the period from January 1, 1960, to December 31, 1979, did the degreasing and cleaning material known as "dry cleaning solvent" that was used for maintenance of the self-propelled guns or other machinery at the Armory (see Definitions) contain PCE (see definitions)?"**

Upon information and belief, the NMARNG personnel followed federal military operating procedures that required the use of "dry-cleaning solvent" or "mineral spirits" to clean the Twin 40-MM Full Tracked Self-Propelled Gun M42 (T141), as well as guns and other equipment at the maintenance facility. We have no record of what the federal technicians used, purchased, or disposed of while at the site. We also have no record specifically listing PCE as a chemical found in the "dry cleaning solvent" or "mineral spirits" used on site.

We note that the Marten Group, on behalf of the City of Las Cruces and the County of Dona Ana, has provided information regarding this issue to the EPA, and that we have received copies of that information. We have not verified those materials and make no statement as to the applicability or accuracy of the materials that the Marten Group has provided.

**5. "Identify (see Definitions) any documents, including technical manuals or specification sheets, in effect during a time period which includes any time from January 1, 1960, to December 31, 1979, which lists PCE (see Definitions) as one of the ingredients for CR or dry cleaning solvent. Provide a copy of all documents identified."**

We have no records, documents, or technical manuals that list PCE as a part of a solvent or cleaning compound that was used by the federal technicians while at the site. We also have no record specifically listing PCE as a chemical found in the "dry cleaning solvent" or "mineral spirits" used on site.

**6. "Identify (see Definitions) any person (see Definitions) you think may be able to provide a more detailed or complete response to any information request contained herein, along with the additional information or documents (see Definitions) that you think the person may have."**

We understand that a similar Section 104(e) request was delivered to the Department of the Army, which we believe would have additional information or documents on all of the above questions.

**7. "On the enclosed map, which is marked as Exhibit 1, please indicate in writing the location of the following and return the map to EPA along with your response to this information request:**

**a. The steam racks that were located outside the Armory (see Definitions) building on a Concrete Pad;**

There were no steam racks located at this facility.

**b. The Armory building maintenance bays;**

There was no maintenance conducted inside the armory and therefore, no maintenance bays

At this building.

**c. The area known as the "track yard", "Track Park", "parking area", or simply the "yard". This area**

**May have been located south of the Armory building.**

**d. The Armory shop building that contained the “degreaser”.**

**e. Any area at or near the Armory where CR may have been spilled;**

**f. Any area at or near the Armory where dry cleaning solvent may have been spilled; and**

**Any area at or near the Armory where PCE (see Definitions) may have been spilled.”**

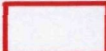
Please see attached.

[End of response]





**Quitclaim Deed Description 345/784**  
**700 N. Solano Dr.**  
**Las Cruces, New Mexico**

 **Quitclaim Boundary**

Notes: Property boundary delineated per the description on Quitclaim Deed 345/784 dated 11/19/1990. The boundaries are approximate and should not be considered survey quality. Road features are from Tele Atlas. The GlobeExplorer aerial is dated 08/01/07.



EPA Region 6  
 Superfund  
 GIS Support Team  
 6/26/2009



LOCKHEED MARTIN



# Solano Armory (1972)



Photograph courtesy of Daniel B. Stephens & Associates.